

the Invention includes unacceptable legal phraseology, includes mere generalities, or is overly broad. Indeed, we submit that the language used in the Summary of the Invention would be readily understood by a person of ordinary skill in the art, introduces no phraseology that could not be generally understood without reading the specification, and is specifically tailored to the inventions which are believed to be patentable. If the Examiner continues to feel otherwise, we ask the Examiner to please be more specific so that we can address those concerns.

The Examiner rejected claims 25-28 and 30 as being fully anticipated by a reference by Klassens et al. In support of the rejection, the Examiner refers to "a plurality of charge storage elements (C_1^a , C_2^a , C_3^a , C_1^b , C_2^b , C_3^b), a plurality of charge transfer elements (SMa/SMb), and a charge redistribution circuit (SMa/SMb)."

First, we point out that the capacitors to which the Examiner has referred, namely, capacitors C_1^a , C_2^a , C_3^a , C_1^b , C_2^b , C_3^b , are not charge storage elements but rather they are high frequency, input and output capacitors (see page 347, left column, 1st ¶). Those capacitors sit across the respective input and output terminals that represent either the three-phase source or three-phase load and they act to filter out high frequency

noise from those signals. They do not act as charge storage devices as recited in the relevant claims (e.g. claims 25-28).

Second, we note that Klassens et al. do not teach or even suggest a charge redistribution circuit of the type recited in claims 25 and 27, namely,

a charge redistribution circuit connected to the plurality of charge storage elements, wherein during operation the charge redistribution circuit redistributes charge among the plurality of charge storage elements

There is no phase of operation of the circuit of Klassens et al. during which charge is redistributed among storage capacitors or storage elements.

Thirdly, Klassens et al. do not teach or suggest a controller and first transfer circuit of the type recited in claim 28, namely,

wherein the controller causes the first transfer circuit to sequentially charge the plurality of charge storage elements to respective different voltages and in order of increasing voltage, starting with the charge storage element with the lowest voltage and ending with the charge storage element with the highest voltage

We note that this limitation is similar to one found in claim 29, which the Examiner appears to have allowed.

Finally, with regard to claim 30, we note that Klassens et al. do not ever discuss using non-zero current conditions

prior to "transferring charge between the multiphase grid and the plurality of charge storage elements", as recited.

For the reasons stated above, we submit that all of the claims are now in condition for allowance, which action is requested. Filed herewith is a Petition for Automatic Extension with the required fee.

Please charge any additional fees, or make any credits, to Deposit Account No. 06-1050.

Respectfully submitted,

Date: Mar 22, 1999



Eric L. Prah
Reg. No. 32,590

Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110-2804

Telephone: 617/542-5070
Facsimile: 617/542-8906
348186.B11